



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

MEMORANDUM

TO: Honorable Board of Supervisors

FROM: Michael J. Johnson, AICP
CDRA Director

DATE: October 19, 2010

SUBJECT: Placer County Comments on Certain Policies and Implementation Measures
Tahoe Regional Planning Agency Regional Plan Update

ACTION REQUESTED

Direct staff to resubmit comments reflecting Placer County's position on the Tahoe Regional Planning Agency Regional Plan Update related to Land Use, Transportation, Noise, Soil Conservation, Water Quality, and Stream Environment Zone Sub-element policies that were not fully vetted in the TRPA staff report to the Governing Board.

BACKGROUND

The first phase of the Regional Plan Update (RPU) process included numerous "Milestone" meetings with Stakeholders to review the Project Description, including four alternatives that are to be studied in the Environmental Impact Statement (EIS) for the RPU. Milestones are a set of key policy areas that represent portions of the proposed Regional Plan.

The results of these Stakeholder meetings, and subsequent proposed modifications to the Project Description, are summarized in a series of "FactSheets" presented to the TRPA Governing Board. These FactSheets also include several "major issues," which resulted in staff proposing changes to the plan alternatives.

The Tahoe Regional Planning Agency (TRPA) Governing Board has extended the cut-off date for identifying additional issues and submitting new comments to be taken into consideration as part of the environmental analysis for the Regional Plan Update.

The intent with this deadline extension is to capture issues missed during the first phase of the effort. The new date for comments to TRPA staff is Wednesday, October 13, 2010. As a Regional Plan Stakeholder, Placer County was invited to submit any additional suggestions and comments on the RPU that have not already been addressed by TRPA.

CURRENT STATUS

County Executive Office and Planning Division staff presented an informational briefing to your Board on May 18, 2010 regarding input on the Regional Plan Update provided by County staff at various stakeholder meetings, TRPA Advisory Planning Commission hearings, TRPA Governing Board hearings, and in written form. The update generated discussion and feedback from your Board and

provided confirmation that the County staff is implementing your Board's direction thus far in providing comments on the Regional Plan.

In order to affirm Placer County's position on certain policies prior to the TRPA Governing Board consideration, on June 22 and July 27, 2010, staff requested and received your Board's endorsement of various policy concepts. The following policy concepts were either provided by County staff at various stakeholder meetings or in the form of comment letters, but were not fully vetted in the TRPA staff report to the Governing Board. Staff is requesting your Board's continued endorsement of these policy concepts:

Land Use

- Maintain consistency with existing and proposed Placer County land use regulations including:
 - Permitting requirements for cellular communication facilities in residential and along scenic roadway areas.
 - Adding to one of the proposed alternatives a modification to the definition of "domestic animal raising" to allow for the keeping of chicken hens.
 - Allowance for a Wayfinding Signage program for the Lake Tahoe Basin.
- The County supports a Tourist Accommodation Unit (TAU) approach that:
 - Establishes guidelines for the transfer of TAUs, based on analysis and consistent data set, but allows flexibility based on market trends and CEQA/TRPA environmental review
 - Maintains existing practice of allowing inter-jurisdictional transfers
 - Maintains existing number of TAUs

Transportation

- Eliminate the following required actions:
 - Incorporation of bike and pedestrian facilities into all public service projects.
 - Coverage for public bike paths/trails/walkways should not be deducted from land development projects when they are for public benefit.

Noise

- Eliminate the following required actions:
 - Prohibition of development in areas that exceed noise standards. The County previously commented that this is excessive and should be considered on a case by case basis, especially in more dense urbanized nodes with mitigation, not a wholesale prohibition.

Soil Conservation

- Include in one of the proposed alternatives, evaluation of the effectiveness of the mathematical calculation that has inadvertently led to Placer County's high Individual Parcel Evaluation System (IPES) score which has consequently resulted in a reduction of the inventory of buildable lots.

Water Quality

- The TRPA Compact gives TRPA the authority and responsibility to regulate water quality matters which in California overlap the California Water Quality Control Board's Lahontan's authority. Through the Total Maximum Daily Load (TMDL), rather than have two agencies with overlapping authorities, add an alternative that analyzes utilization of TRPA's authority to delegate to Lahontan its water quality regulation authority on the California side, and include incentives to accomplish goals jointly set forth by Lahontan and TRPA.
- The draft Regional Plan proposes to provide land use commodities to facilitate the transfer of development rights and impervious coverage from non Pedestrian Transit Oriented Development (PTOD) sending areas that are verified as low capability lands and thus gain water quality

benefits. These sending areas must be clearly identified, including location and capacity by jurisdiction. In addition, an economic feasibility analysis needs to be completed prior to implementation of this program.

- Alternative 4 requires acquisition and buyout programs to permanently retire excess coverage to assist in the maintenance of the stable commodity prices. It is not possible to "require" acquisition and buyout programs as they are based on willing sellers.
- Placer County agrees with TRPA's recent change in assessment that the Regional Plan needs to analyze various Best Management Practices (BMP) enforcement strategies, even including point of sale but wants to emphasize those local jurisdictions should not be responsible for enforcement.
- Updated BMP design criteria and disposal practices for snow removal/storage is a good goal, but may not be practical to implement especially for municipal/county operations that involve utilizing easements on private property for storage.

Stream Environment Zone

- Implementation measures proposed in this Sub-element recommend the development and adoption of more stringent permitting and environmental review process for project involving SEZ encroachment, increased mitigation to impact ratios and new minimum performance standards for SEZ mitigation. It is unclear as to whether there is a need for these new implementation measures and whether or not they will result in attainment of SEZ goals. In fact, the measures may result in reduced SEZ improvements due to cost increases incurred during the permitting process and attainment of new ratios.

REQUESTED ACTION

Direct staff to resubmit comments reflecting Placer County's position on the above-outlined policy concepts that were not included with the Phase I effort and to return to request future direction as warranted.

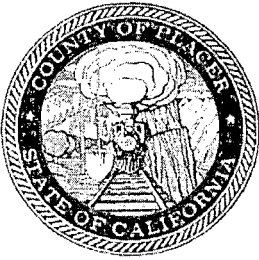
FISCAL IMPACT

None

The following attachments are included for the Board's consideration:

ATTACHMENTS:

- Attachment 1: Staff Reports to the Board (May 18, June 22, and July 27, 2010)
Attachment 2: Letters to TRPA (March 10, March 24 and June 1, 2010)



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

MEMORANDUM

TO: Honorable Board of Supervisors

FROM: Michael J. Johnson, AICP
CDRA Director

DATE: May 18, 2010

SUBJECT: Tahoe Regional Planning Agency - Regional Plan Update Status

ACTION REQUESTED:

The Planning Department and County Executive Office is providing the Board with an update on the TRPA Regional Plan Update. No Board action is requested at this time.

BACKGROUND:

The Tahoe Regional Planning Agency (TRPA) is in the process of updating its Regional Plan and making minor revisions to existing Environmental Threshold Carrying Capacities (Thresholds). The threshold changes are made in an effort to incorporate updated science and changes in law, such as addressing climate change relative to the Region's carbon footprint, and address the risk of catastrophic wildfire. The Regional Plan provides an overview of land use, conservation, restoration, forest health, wildlife management, air quality, and related goals and policies and implementation strategies that, when combined, are designed to accelerate threshold attainment over the next 20 years.

The Regional Plan contains Goals and Policies, and these support Implementation Measures. The aim of the draft documents is to assist stakeholders in the review of the list of proposed changes and to understand how each measure could be affected in each alternative scenario. These Element and Sub-Element documents are descriptive narratives broken down by each sub-element of the plan.

Regional Plan Update Elements

1. LAND USE ELEMENT

Land Use Sub-element
Housing Sub-element
Noise Sub-element
Natural Hazards Sub-element
Air Quality Sub-element
Water Quality Sub-element
Community Design

2. TRANSPORTATION ELEMENT

3. CONSERVATION ELEMENT

Vegetation Sub-element
Wildlife and Fisheries Sub-element
Soil Conservation Sub-element
Shorezone Sub-element
Scenic Sub-element
Open Space Sub-element
Stream Environment Zone (SEZ) Sub-element
Cultural Resources Sub-element
Energy and Climate Change Sub-element

4. RECREATION ELEMENT

Dispersed Recreation Sub-element
Developed Recreation Sub-element
Urban Recreation Sub-element
General Recreation Sub-element
Recreation Education Sub-element

5. PUBLIC SERVICES AND FACILITIES ELEMENT

6. IMPLEMENTATION ELEMENT

Institutional Partnerships Sub-element
Performance Review and Implementation Scheduling Sub-element
Environmental Improvement Sub-element
Education and Outreach Sub-element
Monitoring and Evaluation Sub-element

Alternatives

TRPA has drafted four different Regional Plan scenarios, called Alternatives, for analysis in the Environmental Impact Statement. The alternatives provide a way of projecting and comparing the outcomes of different styles of management:

1. *Alternative One* is the “no project” alternative. Under this alternative no changes would be made except what is necessary to keep up with the regulations of other federal or state agencies.
2. *Alternative Two*, the alternative proposed by TRPA staff, focuses on a combination of incentives, regulation, and collaboration to achieve the environmental thresholds required by the Compact.
3. *Alternative Three* is largely like the “no project” Alternative One, except that it allows for development to continue at a pace very similar to the one we have seen over the past 20 years.
4. *Alternative Four* takes the approach that a decreased amount of allocations and an increased amount of regulation is the best way to ensure that the Thresholds are attained.

The Regional Plan Update alternatives contain a broad range of policies, regulations, supporting scientific rationale and a complete environmental analysis will ultimately be presented to the TRPA Advisory Planning Commission and Governing Board for public hearings, deliberation and action on certification of the Environmental Impact Statement and adoption of the updated Thresholds and Regional Plan.

CURRENT STATUS

TRPA has conducted stakeholder meetings with local jurisdictions and interested parties who have provided input as various sub-elements of the Regional Plan. Comments and suggestions are considered by the TRPA Advisory Planning Commission and finally, agreed upon suggestions are presented to the TRPA Governing Board for action and direction to TRPA staff.

The first Milestone meeting was held on January 10, 2010 and specifically considered the Water Quality and Stream Environment Zones sub-elements of the Regional Plan.

The second Milestone meeting was held on February 24, 2010 and specifically considered the Public Lands, Resource Management and Recreation sub-elements of the Regional Plan.

To ensure that County concerns are properly addressed in the Regional Plan, County staff participates in the many stakeholder meetings, the TRPA Advisory Planning Commission Hearings, and the TRPA Governing Board hearings. Attached for your information and review are copies of the two most recent comment letters to the TRPA regarding the proposed Transect Maps and Allowable Land Use Tables (dated March 10, 2010) and the proposed Air Quality Element (dated March 24, 2010). Currently, staff is coordinating comments regarding

the proposed Transportation, Noise and Climate Change sub-elements and expects to submit those comments later this month.

In summary, this status update is intended to generate discussion and feedback from your Board as well as to seek your concurrence that County staff is implementing your Board's direction thus far in providing comments on the Regional Plan.

Respectfully submitted,



MICHAEL J. JOHNSON, AICP
Director of Planning

Attached to this report for the Board's information/consideration are:

ATTACHMENTS:

Attachment 1: March 10, 2010 letter. Placer County Comments on
Transect Maps and Allowable Land Use Tables

Attachment 2: March 24, 2010 letter. Placer County Comments on the
Air Quality Element

cc: Tom Miller, County Executive Officer
Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Loren Clark, Assistant Planning Director
Wes Zicker, Engineering and Surveying Director
Paul Thompson, Deputy Planning Director
Steve Buelna, Supervising Planner
Ken Grehm, Department of Public Works Director
Peter Kraatz, Deputy Public Works Director
Jim Lobue, Redevelopment Deputy Director
Rae James, Redevelopment Agency
Mary Dietrich, Deputy Facility Services Director
Nick Trifiro, Associate Planner

MEMORANDUM
OFFICE OF THE
BOARD OF SUPERVISORS
COUNTY OF PLACER

TO: Honorable Board of Supervisors

FROM: Thomas M. Miller, County Executive Officer
Submitted by: Jennifer Merchant, Principal Management Analyst

DATE: June 22, 2010

SUBJECT: Placer County Position on Tahoe Regional Planning Agency Regional Plan Update.

ACTION REQUESTED

Direct staff to present comments reflecting Placer County's position on the Tahoe Regional Planning Agency Regional Plan Update related to Land Use, Air Quality, Transportation, Noise and Climate Change/Energy sub-element policies.

BACKGROUND

The TRPA is a regulatory and planning agency charged with protecting Lake Tahoe's famed clarity and the region's environment. In 1969, the United States Congress ratified an agreement between California and Nevada governors and lawmakers and created a bi-state compact that formed a regional planning agency to oversee development at Lake Tahoe. The Compact, as revised in 1980, gave the Tahoe Regional Planning Agency authority to adopt environmental quality standards, and to enforce ordinances designed to achieve these thresholds.

The TRPA is in the process of updating its Regional Plan and making minor revisions to existing Environmental Threshold Carrying Capacities (Thresholds). The Regional Plan provides an overview of land use, conservation, restoration, forest health, wildlife management, air quality, and related goals and policies and implementation strategies that, when combined, are designed to accelerate threshold attainment over the next 20 years.

CURRENT STATUS

County Executive Office and Planning Department staff presented an informational briefing to your Board on May 18, 2010 regarding input on the Regional Plan Update provided by County staff at various stakeholder meetings, TRPA Advisory Planning Commission hearings and TRPA Governing Board hearings and in written form. The update generated discussion and feedback from your Board and provided confirmation that the County staff is implementing your Board's direction thus far in providing comments on the Regional Plan.

In order to reaffirm Placer County's position in specific areas prior to further TRPA Governing Board consideration at upcoming Milestone hearings, staff is requesting that your Board review

and consider endorsement of the following policy concepts. Staff is also prepared to request further direction as the Regional Plan Update is developed.

Land Use

- Maintain consistency with existing Placer County-approved Community Plans, i.e. Tahoe City Gateway.
- Support Pedestrian-Transit Oriented Development and its policies to increase height and density and allow missed use development in town centers.
- Ensure availability of development commodities during interim period after RPU approval but prior to Community Plan update.
- Create affordable housing unit banking policy.
- Streamline “two-step” subdivision process.

Air Quality

- Withhold implementation measure requirements until appropriate monitoring systems are located in Placer County and an Air Quality Attainment Plan is updated to include data and cost benefit analysis.
- Create a policy for pollutants of localized concern (particulate matter and carbon monoxide) that prioritizes emissions reductions projects the closest to the project that is being mitigated.

Transportation

- Eliminate the following required actions:
 - Paid parking as a regional revenue source.
 - Implementation of 20 minute headways in town center areas.
 - Construction and year-round maintenance of bike trails on major transportation corridors.
 - Incorporate bike and pedestrian facilities into all public service projects.

Noise

- Eliminate the following required actions:
 - Prohibition of off-highway, off-road and over-the-snow vehicles from operating within 1,000 feet of residences or other sensitive use areas.
 - Prohibition of development in areas that exceed noise standards.

Energy/Climate Change

- Create a policy that states future basinwide Climate Action Plans should provide flexibility to allow consistency with plans developed by local jurisdictions under state and federal guidelines.

REQUESTED ACTION

Direct staff to submit comments reflecting Placer County's position on the above-outlined policy concepts and to return to request future direction as warranted.

FISCAL IMPACT:

None

MEMORANDUM
OFFICE OF THE
BOARD OF SUPERVISORS
COUNTY OF PLACER

TO: Honorable Board of Supervisors

FROM: Thomas M. Miller, County Executive Officer
Submitted by: Jennifer Merchant, Principal Management Analyst

DATE: July 27, 2010

SUBJECT: Placer County Position on Tahoe Regional Planning Agency Regional Plan Update

ACTION REQUESTED

Direct staff to present comments reflecting Placer County's position on the Tahoe Regional Planning Agency Regional Plan Update related to Conservation Element policies.

BACKGROUND

The TRPA is a regulatory and planning agency charged with protecting Lake Tahoe's famed clarity and the region's environment. The TRPA is in the process of updating its Regional Plan and making minor revisions to existing Environmental Threshold Carrying Capacities (Thresholds). The Regional Plan provides an overview of land use, conservation, restoration, forest health, wildlife management, air quality, and related goals and policies and implementation strategies that, when combined, are designed to accelerate threshold attainment over the next 20 years.

CURRENT STATUS

County Executive Office and Planning Department staff presented an informational briefing to your Board on May 18, 2010 regarding input on the Regional Plan Update provided by County staff at various stakeholder meetings, TRPA Advisory Planning Commission hearings and TRPA Governing Board hearings and in written form. The update generated discussion and feedback from your Board and provided confirmation that the County staff is implementing your Board's direction thus far in providing comments on the Regional Plan.

On June 22, 2010 your Board directed staff to provide specific input regarding proposed changes to the Regional Plan in the areas of Land Use, Air Quality, Transportation, Noise, and Energy/Climate Change. Staff is now requesting that your Board endorse Placer County's position on policy concepts contained in the proposed Conservation Element. The Element consists of subelements on vegetation, wildlife, fisheries, soils, shoreline, scenic resources, open space, SEZ (Stream Environment Zones), cultural resources, and energy. This Element is the last in a series of policy considerations to be reviewed by the TRPA Governing Board. Implementation Measure proposals will come forward in the fall, at which time we expect to provide additional information and request further Board direction.

Vegetation

- Eliminate restrictions on sales of non-native plants within the Tahoe Basin as it directly impacts the free market of local businesses and will not be effective due to the inability to impose restrictions on nurseries external to the Basin.
- Remove any reference to require enforcement of TRPA vegetation regulations by local Public Utility Districts, which could also include private water companies. Concerns include capacity for PUDs and private water companies to manage enforcement and potential for inconsistent enforcement.
- Consider moving proposed Alternative 3 implementation measures to Alternative 4, as they are very restrictive and are more appropriately placed in the most conservative analysis. Proposed Alternative 3 implementation measures require property owners to eliminate invasive weeds, establish a maximum area for lawns, and require landscapers, public agencies, developers and plant vendors to sell only noninvasive vegetation and plants.

Soil Conservation

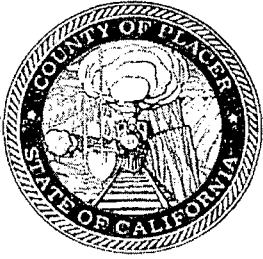
- The environmental impact statement that will be prepared for the Regional Plan Update should evaluate the effectiveness of the mathematical calculation that has inadvertently led to Placer County's high IPES score which has consequently resulted in a reduction of the inventory of buildable lots. This process does not meet the intent of the goals and policies in this section and unfairly limits development on land that is developable in other jurisdictions.
- Placer County does not support discretionary or mandatory site-specific soils analysis requirements on all projects which include but are not limited to single family residential additions and construction of new decks until reasonable criteria are developed and a cost/benefit analysis is completed.

Wildlife and Fisheries

- Remove language that sets specific requirements for non-disturbance zones for special status species in urbanized areas and allow any requirements to be based on TRPA and local agency project review, including assessment of specific site conditions in consultation with respective wildlife agencies/experts.
- Move proposed limitations to operating periods for projects (including development and organized recreation centers and activities) within non-disturbance zones from Alternative 2 to Alternative 4, which takes the approach that an increased amount of regulation is the best way to ensure that the Thresholds are attained.

FISCAL IMPACT

None



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

March 10, 2010

Mr. John Hitchcock
Regional Plan Update Team Lead
Tahoe Regional Planning Agency
PO Box 5300
Stateline, NV 89449

SUBJECT: TRPA Regional Plan Update
Placer County Comments on Transect Maps and Allowable Land Use Tables

Dear Mr. Hitchcock:

Thank you for providing Placer County the opportunity to review the TPRA Draft Regional Plan Update Alternatives and Transect Maps and Allowed Uses. For your convenience, comments from various County Departments including Planning, Facility Services, Redevelopment Agency, and the County Executive Office are included in this letter and conveniently organized by commenting department.

Following are comments provided by the Placer County Planning Department:

It can be confusing to have so many uses listed in each transect. The County suggests removing uses that are not allowed in either the transects or the Plan Area Statements to facilitate an easier review. This may also allow for larger font size making the document easier to read. A clear identification of where the changes to the existing zoning would also be helpful.

Existing densities are not listed when the proposed Transect densities are. Is there a reason for this exclusion? Additionally, a number of instances suggest activities be performed without indicating the responsible party. This information would be helpful to determine the impact of this plan on Placer County. The County also suggests that PAS 031, or the new equivalent transect, recognize Multi-Family as an allowed use, making this transect consistent with Placer County.

Homewood Tahoe Ski Bowl

There is reference to the need for a new Community Plan for any new or additional commercial uses. How would this impact the proposal for Homewood Mountain Resort?

Blackwood

A policy is suggested that "Blackwood Creek should be stabilized and other instream programs to minimize erosion and scouring should be performed." Who would be performing this?

The statement is made that snowmobile use should be prohibited in important wildlife habitat. Where is this habitat identified? How will the public be informed of this? Who will enforce this?

It appears that the current zoning for Blackwood allows pipelines and transmission with the approval of a use permit. The proposed zoning does not allow this in certain transects. The Planning Department suggests the more appropriate approach would be to leave this as allowed with a use permit in areas where there is a question, and allow it to be determined during the public hearing process.

It is confusing to have T4 included in this chart when there is no indication on the map of the presence of T4 zoning. At the same time, T5 is clearly shown on the map, yet there is not a category for it within the chart.

Alpine Ski (new)

The policy seeks to prohibit base facilities. Are there base facilities proposed currently? What is the rationale behind this prohibition? Would it be more appropriate to leave it as a possibility that could be considered in a Conditional Use Permit, since this is a 20 year plan?

There is a note about no new parking facilities. Alpine Peaks HOA recently had a discussion before NTRAC about parking and there was discussion about providing more public spaces so they could enforce no parking.

Alpine Ski (new)

Downhill Ski Facilities indicates the need for a use permit. It should be noted that Placer County requires a Conditional Use Permit for all ski lifts and ski runs.

This seems a bit confusing. T4 is the only transect that appears in the allowed use column, yet it does not appear on the map. It is unclear how the map and the table relate to one another.

Lower Ward Valley

The T3 transect requires a use permit for single family dwellings. The areas identified on the map as T3 are largely existing developed single family dwelling parcels. It seems inappropriate to create a new transect that does not recognize the existing character of an entire area.

Placer County Westshore LDR

Who would be offering the buyout program for Alpine Peaks lots? And is this seen as a viable program? How would this impact the County should the IPES line be dropped to 0 as is the case in every other jurisdiction.

There is discussion of lack of services to Alpine Peaks, specifically fire protection and TCPUD. There are homes there now, how are they served? Have NTFPD or TCPUD commented on suggesting that due to their limitations, owners should retire their development potential in these areas?

Is TRPA referring to transfer of vacant land development rights out of the Mark Twain Tract?

What does S(1-8) mean?

Why are there 3 columns for T5? It appears there is a special area 1. How is this defined, where is it located? It does not appear to be delineated on the map. Without this knowledge it is impossible to comment on whether the proposed changes are appropriate.

Domestic Animal Raising

Placer County is requesting that TRPA revise the definition of "Domestic Animal Raising" to permit the raising and keeping of chicken hens within single family residential districts as part of the Regional Planning Update. Placer County is currently processing a Zoning Text Amendment to allow the raising and keeping of up to three chicken hens primarily within the County's smaller lot size residential zone districts (Chickens are currently permitted within the larger lot zone districts). The keeping of roosters and other types of poultry hens (Guinea, pea, etc..) is prohibited. The County is preparing the Zoning Text Amendment in response to a rapidly growing movement to provide locally raised and grown foods. The County's proposed Zoning Text Amendment has generated an inordinate amount of interest by the public. Placer County highly recommends that TRPA revise the definition of "Domestic Animal Raising" to allow the raising and keeping of chicken hens in the upcoming Regional Planning Update so that TRPA is adequately prepared to address what may become an on-going issue in the future.

Cellular Communications Installations

Cellular installations within portions of Placer County that are also located within the Lake Tahoe Basin are discretionary to the joint authorities of the County and to the Tahoe Regional Planning Agency (TRPA). To that end, the County, through adoption of General Plan and Community Plan documents for Placer County communities located within the Lake Tahoe Basin, has established land use criteria and zoning regulations that conform to land use criteria included in Chapter 18 of the TRPA Code.

Presently, cellular communications installations (Transmission and Receiving Facilities land use) are allowed within all General Plan and Community Plan Area Statements (PAS) within the Placer County portion of the Lake Tahoe Basin with the exception of properties located within the following Plan Area Statements of the West Shore Area General Plan:

- PAS 003 (Lower Truckee - Special Area #1)
- PAS 159, Special Areas 1, 2, and 3 (159 - Homewood/Commercial)
- PAS 160, Special Areas 1, 2, 3, and 4 (160 - Homewood/Residential)
- PAS 166 (Upper Ward Valley)

Additional considerations and restrictions may exist due to the specific policies of each PAS and/or due to location within or proximity to the Lake Tahoe Shorezone. Documents reviewed in reference to the information above include the following:

- West Shore Area General Plan
- Tahoe City Community Plan
- North Tahoe Community Plan, Including:
 - Carnelian Bay
 - Kings Beach
 - Kings Beach Industrial
 - Tahoe Vista
 - North Stateline
 - North Tahoe Area General Plan

Deployment of New Facilities within the Tahoe Basin

The TRPA has recently advised that it may further restrict development of cellular communications sites (Transmission and Receiving Facilities) within certain land use districts within the Basin, such as residential areas and along scenic roadway areas. Placer County currently has no policies to preclude development of cellular facilities in zoning designations or plan areas where they are permitted. However, County staff does work closely with project applicants to provide guidance on the appropriateness of proposed cellular installation locations.

To this end, staff actively encourages cellular representatives to make efficient use of existing communications sites and utility infrastructure, to propose new locations (when necessary) that are sensitive to overall development patterns and land uses, to encourage location of new communication sites within designated commercial and industrial areas, and on properties developed with public safety facilities or public utility facilities. Due to the largely rural character of Placer County, there are significant portions of the County where there are not opportunities to locate new facilities as described above. Therefore County Ordinance does permit these facilities within all zoning districts and nearly all Plan Area Statements subject to approval of a Minor Use Permit or Administrative Approval depending on the type of installation proposed.

When such facilities are proposed in residential areas or in other rural zone districts, staff requires demonstration that the facility would not be disruptive to overall land use patterns and that the facility would not result in considerable impacts to neighboring property owners. Typically, rural residential areas are more conducive to placement of new facilities due to larger parcel sizes while areas with smaller parcels and higher population densities are less conducive. However, areas with smaller parcels and higher population densities are typically located within close proximity to commercial areas, public safety and public utility facilities, and/or transit corridors where alternative siting opportunities may exist.

Effect of Regulation By Local Agency

According to our discussion, the TRPA has expressed a desire to implement regulatory structures relative to requests for approval of new telecommunications facilities on the basis

of perceived health affects related to radio frequency emissions commonly referred to as EMF's. The 1996 Telecommunications Act prohibits State or local agencies from regulating on the basis of EMF's. Section 704 (Facilities Siting; Radio Frequency Emission Standards) of the bill reads, in part, "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's (emphasis added) regulations concerning such emissions." Although local agencies cannot regulate the placement of installations on the basis of EMF's, the Act does not preclude State or local agencies from regulating the land use itself, including prohibition of the land use within any zone district so long as the use is not outright prohibited throughout the jurisdiction.

Wayfinding Signage

As you are aware, the County, TRPA, and a number of other government agencies have been meeting with the North Lake Tahoe Resort Association over the past couple years to address their concept of Wayfinding Signage. The current Sign Ordinance does not provide an allowance for this type of signage. If at all feasible, the Regional Plan Update should provide a mechanism to include this concept within sign regulations for the Lake Tahoe Basin.

Following are comments provided by the Placer County Department of Facility Services:

The focus of our review is to determine impacts to land use regulations that affect activities for services that County government provides in the Tahoe Basin. Additionally, since the Department of Facility Services is also responsible for managing County-owned properties in the Basin, this review included evaluation of changes that would affect the development potential of County-owned properties.

The following comments on this memorandum include observations that globally apply to a number of the Transect areas in the Regional Plan. We have also separately attached comments that apply specifically to the individual Transect areas (Attachment 2). On these sheets we have identified County-owned or leased properties and have provided comments where stated policies or land use changes may affect County's ability to provide services.

Facility Services appreciates the opportunity to comment on the Regional Plan Update and is available to discuss our comments at your convenience.

Facility Services - Property Management

In reviewing the draft TRPA Regional Plan, we observed an inconsistent approach in articulating policies. At times, the policies were appropriately broad as would be expected in a plan of this type. However, there are numerous instances where the policy statements are site-specific and seemingly more appropriate for a community plan or for project level review (E.g. Kings Beach HDR – Policy 7A).

The basis and intent of some policy statements in the draft TRPA Regional Plan are not substantiated (E.g., North Tahoe Recreational Area - Policy 24A.2). In these circumstances, additional clarification would be beneficial.

Some policies call for changes that could possibly have implications for other jurisdictional agencies. Further outreach and consultation with other public agencies in the Tahoe region may be necessary before these policies are moved forward (E.g., Homewood Marina – Policy 4).

The nature of agency approvals (administrative approval or approval with minor use permit/conditional use permit) for many uses has changed. Where revitalization of a specific community such as Kings Beach is a goal, agency approvals should be as administrative as possible. This would also apply in Tahoe City where maintenance of the community's vitality is key.

Given the importance of providing adequate levels of public service for Placer County residents throughout the Tahoe region, it is appropriate to allow Government Office uses with an administrative approval rather than being subject to the special use permit process. Professional Office and Government Office are designated as two separate land use categories. In most Transect areas, Professional Office uses are permitted administratively. However, Professional Office and Government Office provide for functionally identical uses, and the parking requirements are the same for both. Facilities Services strongly recommends that the Governmental Office use be combined with Professional Office, requiring only administrative approval. As an option, allowing Governmental Office uses administratively would be an acceptable alternative.

In a number of the TRPA transect matrices, the labeling for the transect zones did not match the transect zones map legends (E.g. Tahoe Vista CP, Tahoe City Town Center CP). Once these inconsistencies are corrected, additional review may be required.

Tahoe City is an important community center for the delivery of services to residents. We were unable to complete the review of the Tahoe City Town Center Transect area because the labeling and Transect areas do not match. Similarly, Kings Beach is also an area of opportunity for County service delivery. However, no information on this commercial area was provided in the review package. Consequently, Facility Services would like to reserve an opportunity to provide additional comments when clarifications are provided.

Facility Services - Parks

Placer County and other recreation providers have established their own policies according to the interests of their respective constituents. While they share common interests, each entity has unique goals and policies. This plan should not create new obligations of recreation providers without their full participation and input and should not create new funding priorities or requirements.

Because of overlapping responsibilities and interests, a stakeholder group of various public interest holders should be convened prior to addressing public shore zone access policies

described in this document. Isolated comments about public ownership status and rights should be avoided without closer analysis (E.g., Carnelian Bay LDR – Policies 1A and 4A).

It is unclear how the trail plans of the various local Community Plans and the TRPA regional bikeway plan will be incorporated into the Regional Plan Update. Following further clarification, the County would like an opportunity to provide further comment.

In some transect zones riding and hiking trails are precluded or require Special Use Permits. Is this consistent with the TRPA Bicycle and Pedestrian Master Plan that is currently being updated? Requiring Special Use Permits for trails involves a more onerous process and may discourage the development of trail linkages important to the Tahoe Basin (E.g., Granlibakken, Tahoe Vista CP).

Following are comments provided by the Placer County Redevelopment Agency:

The Placer County Redevelopment Agency has a strong interest in the future redevelopment of properties within its North Lake Tahoe Redevelopment Project Area boundaries. The County supports redevelopment activities that accomplish the simultaneous goals of protecting the natural environment, improving substandard housing conditions, upgrading deficient infrastructure, revitalizing the local economy and improving the quality of life for local residents, workers and visitors. The Placer County Redevelopment Agency has invested significant resources to pursue these simultaneous goals by targeting investment and redevelopment project efforts in strategic locations that are considered best placed to provide the greatest overall community benefit. In most cases, the proper land use designations and allowances are critical for the feasibility of implementing these proposed projects. In light of the foregoing, the following comments reflect proposed modifications to the draft materials reviewed and update the February 9, 2009 comments on a previous set of draft transect maps and allowed uses tables.

Alternative 2 is RDA's preferred alternative. However, without maps at a resolution that indicates the boundaries for transects and plan area statements, it is difficult to give final comments. It is my understanding that TRPA is working the County GIS management to provide copies.

Alternative 2 & 4

The Tahoe City Golf Course, the Gateway location (lower Truckee River), the landfill site north of Tahoe City and Lake Forest center, are important to the 20-yr work program for the Redevelopment Agency. They are all currently labeled 'special areas' and these designations by default have created a roadblock to environmental or economic improvement. All three sites suffer from a lack of BMPs, and due to current code language economic incentives to correct environmental challenges and/or sensitive land rehabilitation are non-existent.

Provisions for addressing these unique sites should be explicit in the Regional Plan Update. It is our understanding that if Chapter 15 is amended under the updated Regional Plan, those redevelopment areas would be entitled to incentives outside (or inside) current

community plan areas—in the event Placer County has not updated its community plan areas.

A Housing Obligation Policy provision should be addressed in Alternative 2 and 4 to allow developers to bank or credit constructed affordable housing units that can later be sold to other developers in order to satisfy a housing obligation.

How are timeshares treated in the update? How are fractionals to be dealt with in the discussion of TAUs vs. subdivided units?

Provisions should be included that make government facilities an allowed use if located in an appropriate transect area.

Alternative 4

Alternative 4's constrained development is counter to TRPA's exposed public policies of sustainable development. Through its creation of new burdensome code requirements, it defacto makes development economically infeasible and places local jurisdictions in financial jeopardy.

The measure to require Class I bike trails on both sides of a street in a redevelopment area is not only cost prohibitive to sustainable development, it is not physically feasible++ in most redevelopment communities in North Lake Tahoe.

Following are comments provided by the Placer County Executive Office:

Land Use Comments

Page 33, Subdivisions. This policy prohibits projects that are consistent with TRPA goals and must be changed/clarified, especially in regard to mixed use development. The two step process is not consistent with current California building code.

Table LU-2 on Page 34 is not readable.

Alternative 2

Buzz words and terms such as Pedestrian Transit Oriented Development, promote and provide don't have a lot of meaning without some more detailed definition. The alternatives section is not complete without this.

Community Plan areas should be shown on the west shore, including Sunnyside, Homewood and Tahoma, where, as defined by the document, "infrastructure capacity and facilities exist." It is not appropriate that even the most intensely developed alternative does not provide for/acknowledge development in existing West Shore communities. This must be changed, as it will also result in zero to minimal environmental improvements here.

The document must provide transect district information for Placer County. The hugely sized transect document (18 pages printed and taped together) is confusing in intent and lacks

John Hitchcock
March 10, 2010
Page 9 of 10

detail. This type of documentation should also be provided to local jurisdictions via hard copy, not only electronic file.

The accompanying maps are unmarked segments of the basin and impossible to identify.

District definitions- Why are residential structures limited to one to two stories, if height allowance is 38 feet, which would accommodate three stories? Also, can't really assess agreement without comparative maps.

Disagree with statement on page 46 that "incentives and allocations proposed in Alternative 2 would not be available until an area's CP is either adopted or updated consistent with the updated Regional Plan." This process could take 5-10 years. Placer County has for nearly a year requested TRPA to review and discuss with Placer County what happens when RP is inconsistent with County/TRPA CPs. If this is a response to that question, this is not acceptable.

Minimum density of 8 units/acre is not high enough to incentivise ped/transt oriented development. LEED minimum is at least twice as high. This will not result in the envisioned PTOD TRPA seems to be promoting in Alternative 2.

Concern re: requirement of site specific soil survey—for every project??? Needs clarification.

Clarify statement on Page 49 that "allocation of additional CFA and TAU quantities would depend on reuse and conversion of existing development." This process needs to be fully developed so that we can provide input.

Jurisdictions should be allowed to retain any and all residential allocations "earned" through investments in EIP implementation.

Do not agree with "deed-restricted, owner-occupied" concept as explained on Page 50. This is not likely to yield the type of development being envisioned.

Alternative 4

It is not acceptable that this alternative does not include Tahoe City. What is the logic behind this decision?

On Page 55, why is it proposed that the USFS would increase its acquisition of residential lands? What benefit does this have to the long-term health of the basin? It is also unclear whether this is a funded USFS priority, and therefore even possible.

Please explain how exclusion of PTOD in all areas north of the south "wye" and west of north Stateline will help TRPA attain its environmental goals. This excludes some of the most densely populated and developed portions of the basin from Tahoma to Tahoe City to Carnelian Bay to Tahoe Vista and seems ill-advised.

John Hitchcock
March 10, 2010
Page 10 of 10

If reduced residential allocations were implemented it would be unfair to Placer County, which has developed fewer units than other jurisdictions.

Housing Subelement

"Encouraging" local jurisdictions to provide their "fair share" of affordable housing is not acceptable without more definition and process. We can comment further when this has been more fully defined.

Is fulltime residents defined anywhere? Does this include seasonal residents?

Conclusion

Knowing the commitment that TRPA has made to assuring the success of the Regional Plan, the County comments above reflect the County's commitment to assisting TRPA in preparing a Regional Plan that is complete, accurate and, most importantly, implementable. Placer County remains committed in achieving the overall goal of protecting Lake Tahoe and its surrounding environment while sustaining the vitality and well-being of the various Placer County communities and citizens who reside nearby.

Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3044. I look forward to working together with you and your team on the successful completion of the Regional Plan Update.

Sincerely,



PAUL THOMPSON
Deputy Planning Director
Placer County Planning Department

ATTACHMENTS

Attachment 1: TRPA Plan Review Spreadsheet containing Comments from the
Department of Facility Services

cc: Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Loren Clark, Assistant Planning Director
Wes Zicker, Engineering and Surveying Director
Paul Thompson, Deputy Planning Director
Steve Buelna, Supervising Planner
Ken Grehm, Department of Public Works Director
Peter Kraatz, Deputy Public Works Director
Jim Lobue, Redevelopment Deputy Director
Rae James, Redevelopment Agency
Mary Dietrich, Deputy Facility Services Director
Nick Trifiro, Associate Planner



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

March 23, 2010

Harmon Zuckerman, Regional Plan Update Manager
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

Dear Mr. Zuckerman:

Thank you for providing Placer County the opportunity to review the TRPA Draft Regional Plan Update Air Quality Element.

These comments have been compiled via outreach to County departments and external agencies, including air quality and fire agencies.

Placer County shares TRPA's objectives of achieving improvements in air quality by implementing practical and measurable projects and services. However, Placer County has concerns with the Air Quality Element's lack of a developed Air Quality Attainment Plan and the absence of science and analysis for supporting the various proposed implementation measures. Placer County, along with other local and regional jurisdictions, respectfully requests that such a plan be created prior to further work on possible implementation measures and that TRPA coordinate with local air districts to ensure consistency with Federal and State air quality attainment requirements. The plan, similar to the development of the Lake Tahoe Total Maximum Daily Load (TMDL) program should, through monitoring and modeling, include a comprehensive scientific analysis of pollutant sources by jurisdiction so that a fair share implementation plan can be developed. The current network of monitoring stations does not adequately characterize key pollutants in Placer County. It would be our expectation that any ensuing implementation measures would then specifically mitigate the impacts identified for each Regional Plan Update alternative.

Without such a plan, and an accompanying cost benefit analysis for each proposed implementation measure, it is impossible to fully assess the implementation lists provided for each alternative. While many of the proposed implementation measures are used, in part, in other regions throughout the United States to successfully reduce air pollution, the list presented may not be a realistic list for a path to attainment.

Other comments:

- Many of the current implementation measures recommended may conflict with other TRPA goals, including water quality/SEZ, and in some cases even seem inconsistent with transportation and air quality goals.
- It is unclear how "prioritization" of TRPA Air Quality Mitigation Funds will be administered. Will funds still be allocated by jurisdiction, or is the proposal to create a basinwide fund? Placer County does not support converting the existing AQ fund structure from jurisdiction specific to basinwide.
- We are unclear how the first AQ goal of attaining and maintaining AQ for human and ecosystem health is different from second goal of reducing emissions. If emissions were reduced then human ecosystem health would be improved. The County recommends including the second goal as part of first one. If not, it would be important to understand the difference in standards for these goals.
- Many of the document's stated "policies" read similar to "implementation measures." For example, under the second goal, policies include installing and maintaining year-round bicycle trails, sidewalks and bike lanes, and integrating traffic signals. These are projects and should be included in a capital improvement plan that would implement the goals and policies.
- Most implementation measures are not documented with enough level of detail for implementers to understand associated capital and ongoing maintenance and operations funding. Many measures also seem to lack understanding of potential limitations of operating in a mountain environment.
- It is recommended that consideration be given to enumerating bullet points so they can be more easily referenced.

Knowing the commitment that TRPA has made to assuring the success of the Regional Plan, the County comments above reflect the County's commitment to assisting TRPA in preparing a Regional Plan that is complete, accurate and, most importantly, implementable.

Placer County remains committed in achieving the overall goal of protecting Lake Tahoe and its surrounding environment while sustaining the vitality and well-being of the various Placer County communities and citizens who reside nearby.

Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3044. I look forward to working together with you and your team on the successful completion of the Regional Plan Update.

Sincerely,



PAUL THOMPSON
Deputy Planning Director
Placer County Planning Department

cc: Jennifer Montgomery, District 5 Supervisor
Michael J. Johnson, CDRA Director
Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Steve Buelna, Supervising Planner
Peter Kraatz, Deputy Public Works Director
Rae James, Redevelopment Agency
Will Garner, Public Works Manager/Transit Services
Tom Christofk, Air Pollution Control District Director
Paul Thompson, Deputy Planning Director



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

June 1, 2010

Harmon Zuckerman, Regional Plan Update Manager
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

SUBJECT: TRPA Regional Plan Update
Placer County Comments on Transportation, Noise, and Climate Change.

Dear Mr. Zuckerman:

Thank you for providing Placer County the opportunity to review the Transportation, Noise, and Climate Change subelements of the Draft Regional Plan. For your convenience, comments from various County Departments including Planning, Sheriff, Public Works and the County Executive Office are included in this letter and conveniently organized by commenting department.

COMMENTS FROM PLACER COUNTY PLANNING DEPARTMENT:

Transportation:

- We concur with the City of South Lake Tahoe comment at the stakeholder meeting that while the goal may be for walkable communities, the weather of this region makes that impractical for a year round design.
- This document speaks to providing mixed mode streets including bike paths/trails and walkways. Placer County coverage for such features should not be deducted from land development projects when they are for public benefit. The design of these features would be driven by providing the least coverage possible and would have more practical applications (better designs) and would therefore be more likely to be utilized.
- Page 107 again speaks to providing incentives for local governments to participate in redevelopment. The incentive(s) should be identified and be deliverable by TRPA.
- As was discussed at the stakeholder meeting, the discussion on lifting the minimum parking requirement could present conflicts for the local jurisdictions. It is the County's position that by doing so, developers may not provide the parking needed and simply larger buildings. While the alternative modes of transit are admirable to aspire to, from a practical standpoint it is unrealistic to assume a complete shift away from vehicular transit.

Also discussed at the meeting were the efforts of Placer County to establish an "in lieu fee parking program" that would allow developers to provide less parking than required by the ordinance when approved by the director. The fees would be used towards providing future public parking facilities in the area. Placer County requests that the Regional Plan Update could include this as a viable mechanism for addressing parking demand/requirements of projects.

- Alternative 4 suggests requiring property owners who have more than the minimum parking to reduce their parking to the minimum and require coverage restoration. The County does not see how TRPA would achieve success implementing this as a policy. Unlike the BMP program which was based on science, this is based on an assumption that reducing parking will reduce traffic. It seems unreasonable to require property owners to reduce coverage, which is known to be a valuable commodity, without the option of banking or compensation of the restored coverage.

Energy and Climate Change:

- The County encourages TRPA to continue to work with the local jurisdictions to make certain their efforts in this area are consistent with the local efforts.

Noise:

- The 1,000 foot distance prohibition for off-road vehicles from residences seems to be an arbitrary link to the impact. The County suggests that the restriction be based on decibels instead. If the implementation measure is to be based on distance, it should be supported by evidence of the distance arrived at.
- The document states "Require the use of low-noise pavement on all major transportation routes...." Are these surfaces proven to be successful and has their durability been proven, particularly in a snow environment? How would TRPA require state and local jurisdictions to implement the requirement and do the costs of low-noise pavement outweigh the benefits? What would the cost implication be of such a requirement?

COMMENTS FROM PLACER COUNTY SHERIFF'S DEPARTMENT - NOISE:

The primary concern for the Sheriff's Department, based on the proposed Noise Chapter of the new Regional Plan, would be the impacts to staffing and response time. If the Sheriff's Department is intended to be the primary responder to noise complaints, this will create a tremendous burden on the Department not only from a response standpoint, but also for training on the decibel meters as well as the regulations themselves. Similarly, enforcement of air craft noise, snow mobiles, and other off-road vehicles would be infeasible as the Sheriff's Department does not have typical patrol vehicles capable of interdicting and performing enforcement stops of potential violators. The prioritization of response would place noise matters in a similar category to outboard motors and Quagga Mussels that rarely (if ever) result in citations. While the surface of the proposal seems like a fair concept, the enforcement of this proposal would be problematic at best. It would appear that there are already laws in place that address many of these issues (namely noise standards, nuisances, etc.).

COMMENTS FROM PLACER COUNTY DEPARTMENT OF PUBLIC WORKS:

- On Page 107 the last sentence in the first paragraph for Alternative 2 states "Dedicated transitways would evolve over time, as use allows, for bus rapid transit to light rail". There might be places around the lake, south shore in particular, where this might be feasible but doesn't seem to be an achievable goal in Placer County. The County doesn't believe that it would occur on its own as uses allow, so how would this be implemented?
- The last sentence of paragraph 2 states the bike lanes would be added to all major transportation corridors. Which corridors are considered major? It would seem that it could be either bike lanes or a bike path that could provide these connections and serve the same purpose.
- On Page 108, Number 4 would require the local agencies to establish a parking fee to fund other non-auto uses. It is not clear if the metered parking would apply to private parking areas or simply public lots and on-street parking. With the recent news of difficulty the Town of Truckee is experiencing with their metered parking program, this may not be a model we would want to follow for the Lake Tahoe region? (See attached article)
- This doesn't seem to be a goal that would be supported by all jurisdictions and is a mandate to the locals.
- In the implementation measure of Alternative 2, under the first bullet, it states that public-service (including roadways) projects would be required to incorporate pedestrian and bicycle facilities into their plans. While the County agrees that these are great features to have, there might be times when while improving a roadway and drainage, features for other environmental purposes and the other facilities cannot be funded by the source secured. In those cases, we would not get other environmental benefits because we couldn't construct a pedestrian path. The wording should be changed to allow for some instances where the facilities are not required. This applies to Alternative 3 as well.
- The second bullet has similar language that might not allow for a good project to move forward. As an example, there are areas around the lake that might require a substantial amount of investment to go from a 3 foot shoulder to a 4 foot shoulder, the difference between it being a wide shoulder and Class 2 facility. It could require a significant cut into a hillside causing a visual scare or a costly retaining wall to achieve the additional widening needed. There should be some flexibility for when a project doesn't work in the space provided. Three foot shoulders are much better than no shoulder at all.
- Bullet 5 discusses level of service. It appears that TRPA is keeping the same Level of Service (LOS) policy currently in place and this is problematic for any development in the Kings Beach area that requires a traffic study, as well as, other congested areas around the lake. If the TRPA Governing Board and the County BOS approved a project that we know will operate at a LOS below the TRPA standard and any project required to do a traffic study in this area will have to make findings of overriding consideration. We know what the LOS is going to be, so we should define it appropriately. This comment applies

to all areas around the lake with congestion. Tahoe City would be another specific location that we not meet LOS standards during peak times.

- The last bullet on page 109 state "Provide waterborne transit." how is this proposed to be funded? Implementation Measure in Alternative 3 speaks to providing a North-South waterborne connection. Who would be providing this connection?
- Alternative 4 discusses road base fees. Caltrans has been very clear this isn't something they would support and since all of the roadways on the California side, entering the Basin, are under their jurisdiction this doesn't seem feasible.
- The sixth bullet point is an issue the County has commented on several times in the past and we don't believe TRPA should be, nor has the authority to mandate the type of fuel used in the public fleet.
- The fifth bullet on page 109 makes a statement about increased frequency of transit service to 20 minute headways, extended evening service and extended service to areas not served. It is not clear what the context of these statements are and it should be noted that this represents more than a 200% increase in transit service on the north shore being referenced within Alternative #2. The County estimates this to be an initial capital investment of about \$5 million and roughly \$3.75 to \$4 million per year to operate, depending on what level of service were added to evening hours and areas currently not served. This is outside the scope of current resources and any reasonable proposed new funding sources. Assuming that transit funding sources stabilize and begin to grow slowly over time, added services will need to be done incrementally and as a result of a short range transit plan that is approved by the Board of Supervisors.
- The first paragraph on Page 112 notes that under Alternative 4, transit systems would be required to emit one half as many carbon dioxide emissions per person per mile as private vehicles do. The County would need to know what the current status of emissions per person per mile is compared to private vehicles currently to be able to evaluate if this is a reasonable statement. Also, based on the placement of this statement in the document, it is not clear if this is an implementation measure or a goal.
- On page 112, 4th bulleted paragraph, there is an implementation measure to provide transit route frequency to 15 minutes or greater, extend service and make it free. This would be more than a 300% increase in TART service, have an initial capital cost of about \$7 million and cost roughly \$5.25 million to operate on the north shore. Again, this is far beyond any reasonable funding resources that are available to transit.

COMMENTS FROM PLACER COUNTY EXECUTIVE OFFICE:

Transportation:

- Technical terms should be included in a definition section. Example: Intelligent Systems Technology.

- Page 105- Overview. LOS standards should be calculated seasonally with a 30th highest hour factor so as not to overburden projects with peak season road impacts that are expected during summer and winter peaks and could result in overbuilding facilities for minimal peak need
- Page 106- Overview- it should be noted when discussing TRPA's role as MPO that the MPO includes representatives from the USFS and Washoe Tribe.
- Page 107- Alternative 2- Summary- There is no associated fiscal plan that illustrates the statement that "user fees related to private vehicle use support the transit system" is sound. What type of use fee is being considered? How much money would this raise? How much does the transit system under this proposal cost on an annual basis? Will that transit system meet the goals set forth in the Regional Plan? How is that measured?
- The statement that dedicated transitways would evolve over time, as use allows, from bus rapid transit to light rail is unrealistic based on funding and right-of-way availability. Is this proposed for all highways, or where?
- Please define the term "all major transportation corridors", as it relates to the concept that they would all have "frequent" transit and bike lanes.
- In the third paragraph, add the word residents to the list of people for whom transportation options would be provided.
- The first of four goals doesn't sound like a goal. Rather than providing incentives for redevelopment, this goal should be more related specifically to transportation goals, like "incentivize" participation in PTOD redevelopment.
- Page 108- Goals, continued- Under Goal 3, suggest removing "inter-intra regional transportation," as the following sentence is self-explanatory.
- It is confusing whether the four goals from the 1987 Regional Plan would be modified as stated or whether these goals are directly from the Plan. The act of encouraging something [walkable mixed use centers] is not a goal, nor is "strengthen[ing] language related to. . .].
- The statement that "bicycle and pedestrian access in commercial and residential projects shall, at a minimum, be provided at a level equal to private vehicle access" is confusing. What does this mean? A specific example might help.
- In the fourth goal, upgrading regional roadways to improve traffic flow might not be consistent with previously-stated PTOD goals.
- Is there a funding/implementation to attain these goals? What is the source? Fees on private vehicle use?

- Under Implementation Measures, please define "to be determined by TRPA as appropriate to the scale of development."
- Page 109- In the second bullet point, please explain how funds will be "generate[d] from private vehicle use and/or parking management plans" to provide for 20 minute transit service around the lake. Where is the finance plan for this? Also, in the second sentence it is explained that this fund will also "provide deep discount transit passes for community residents." It is not clear how this will be funded and is mistakenly included as a possible means of raising money, when in actuality it costs money.
- Following last month's APC meeting, a transportation staff person provided us with a draft revenue generation plan based on charging visitors at lodging locations for parking per room. Lodging providers are already tasked with collecting room tax and this would be yet another tax on lodging, rather than spreading revenue generation responsibility to other benefit groups. This also creates a further unfair business advantage for lodging outside of the Tahoe basin, placing even further disincentive for visitors to choose in-basin lodging. Placer County does not support this concept. As an aside, for FY 2010-2011, we have budgeted \$942,000 in TOT (room tax) funds to be allocated to transit service in the Tahoe basin.
- In the fourth bullet point, what are "protocols described in NCHRP Web-Only Document 128?" This should be attached or a reference provided. Also, why would a level of service D be required for transit vehicles when F is allowed during certain peak periods. Since both use the same roadway, this would be impossible to attain. In that same paragraph an excellent concept that needs to be further explored is to allow LOS to be exceeded when other modes are taken into consideration. This would work especially when devising LOS for peak periods in town centers where you are trying to maximize density in comparison to other locations. The dates in this section are out of context without a year. Are these ideas proposed to occur in 2012?
- Where will funding come from to "increase fixed route transit frequency on the north shore to 20 minutes? Is there a demonstrated need for this service?" Placer County is not aware that this is listed as an unmet transit need that is reasonable to meet in any of the TRPA documents.
- Page 111- Placer County has concerns with the practical application of the goals in Alternative 4. In summary, concepts such as "requiring coverage restoration of 'unused parking capacity,' external intercept lots with shuttles to the basin and a 'road user fee' are neither demonstrated to be necessary or feasible. Further, it is not clear that TRPA has the legal authority to "require that owners of public and private vehicle fleets use the best available fuel technologies."

Noise

- N-4- Placer County does not support a ban on seaplane bases or docking facilities in the Tahoe Basin, as well as the prohibition of seaplanes within 1 mile of the Lake Tahoe shoreline. There is a seaplane heritage that is celebrated annually and also business

operations that currently exist. Definitions such as the proposed seaplane definition of "anything that flies and can land on water" should be cautioned against. The definition itself is so broad that a number of unintended consequences could result. Lastly, one has to wonder if the noises generated by these sources result in a significant contribution to any real or perceived noise problems in the Lake Tahoe Basin.

- N-6- These statements under Implementation Measures appear to be contradictory: "All events that have the potential to violate noise standards shall be permitted and monitored. Events that may contribute to noise violations will not be permitted."
- N-12- Implementation Measure 34, "TRPA shall not approve a project which causes a community noise standard (CNEL) to be exceeded or causes further degradation to an existing non compliance condition," is excessive and should be considered on a case-by-case basis in specified community center corridors with mitigation.

Energy and Climate Change

Placer County recommends adhering to State of California protocols/requirements and working with local governments who also need to meet state mandates to coordinate consistent planning/implementation documents.

Conclusion

Knowing the commitment that TRPA has made to assuring the success of the Regional Plan, the comments above reflect the County's commitment to assisting TRPA in preparing a Regional Plan that is complete, accurate and, most importantly, implementable.

Placer County remains committed in achieving the overall goal of protecting Lake Tahoe and its surrounding environment while sustaining the vitality and well-being of the various Placer County communities and citizens who reside nearby.

Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3044. I look forward to working together with you and your team on the successful completion of the Regional Plan Update.

Sincerely,



PAUL THOMPSON
Deputy Planning Director
Placer County Planning Department

cc: Tom Miller, County Executive Officer
Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Loren Clark, Assistant Planning Director
Wes Zicker, Engineering and Surveying Director

Harmon Zuckerman
June 1, 2010
Page 8 of 8

Paul Thompson, Deputy Planning Director
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